

Sent: Thur 12/12/2013 7:07:10 PM
Subject: Bennoc

Bennoc

Kevin asked what are the sources of the waste stream
 stormwater and groundwater
 pond 001/023 will be re-sized
 Kevin says permit states that there are also condensates and washwater
 (Part 2K of permit?)

Is the discharge continuous or intermittent? Kevin says it has high TDS.
 Eric says 024 has had only three or four discharges in the past few years
 Currently, 023 is continuous but the pond redesign will make it an
 intermittent

Permit is not written for pond redesign, Eric agreed to rewrite the
 permit so that pond will hold a 25 year/24 hr flow

Kevin says may need sulfate limit (he said based on narrative)
 Eric counters with maybe requiring acute WET
 (Should they also do chronic?)
 Somebody says on the other side that they may not think RP is determined
 but could do WET testing to decide later

Antidegradation Analysis

Assimilative Capacity and the 70% set aside. We have no analysis by OEPA.
 OEPA says the 70% does not apply for stormwater discharge. They say they
 need to make that demonstration.

Gary says the wet weather exclusion is based on very specific situations but
 the permit seems to say not a stormwater permit. May be resolved in
 next permit

Gary brings up how does ground water feed into the adeg analysis if it is
 part of the wastestream? Other side says that the redesign should
 be such that there will be no groundwater inflow

OEPA will be sending in a revised permit but does not want it to reset clocks and
 delay permit issuance. Eric wants the specific objections letter. Kevin says our
 objection letter should be going out next week. OEPA agrees with letting us send
 the objection letter and move the permit that way.

